

Safety Evaluation by the DOE Regulatory Unit (RU)
of Proposed Authorization Basis Amendment Request
ABAR-W375-99-00013,
"Modification of SRD Criteria 4.5, Fire Protection (ISMP Reference)"
(Contract No. DE-AC27-96RL13308)

1.0 INTRODUCTION

In accordance with the requirements of RL/REG-97-13, *Regulatory Unit Position on Contractor Initiated Changes to the Authorization Basis*, Rev. 6, BNFL submitted an Authorization Basis Amendment Request (ABAR) proposing to eliminate the references to sections of the Integrated Safety Management Plan (ISMP) as an implementing standard for the safety criteria in Safety Requirements Document (SRD) Section 4.5, Fire Protection. Specifically, references to ISMP sections are being eliminated for SRD safety criteria 4.5-8, -15, -16, -17, -18, -20, -21, -22, and -23. The ABAR is part of an ongoing effort by BNFL to remove reliance on the ISMP as an implementing standard for the SRD.

2.0 BACKGROUND

In the SRD, BNFL defines safety criteria (4.5-1 through 4.5-23) related to Fire Protection. As an implementing standard for several of these criteria, BNFL previously chose to use sections of the ISMP as *ad hoc* subordinate standards, in addition to specific DOE orders and nationally recognized consensus standards. In this ABAR, BNFL proposes to eliminate the references to the ISMP sections and to rely upon the following standards, as applicable, for implementation of the SRD safety criteria:

- DOE Standard DOE-STD-1066-97, "Fire Protection Design Criteria"
- DOE G-440.1, "Implementation Guide for Use with DOE Orders 420.1 and 440.1 Fire Safety Program"
- National Fire Protection Association (NFPA) Standard 801-95, "Standard for Facilities Handling Radioactive Materials"

SRD safety criteria 4.5-8, -17, and -20 reference all three of the above as implementing standards. SRD safety criteria 4.5-15, -16, -18, -21, -22, and -23 only reference DOE G-440.1 and NFPA 801-95 as implementing standards.

3.0 EVALUATION

The RU reviewed the BNFL proposal to eliminate the ISMP references as subordinate standards for SRD safety criteria 4.5-8, -15, -16, -17, -18, -20, -21, -22, and -23. The RU's analysis of this

proposal is attached (Appendix A). As discussed in Appendix A, the RU found the proposed changes to be acceptable because, in summary, the ISMP sections being deleted as ad hoc implementing standards are either redundant with the safety criteria or other implementing standards, or provide no implementing standards that are relevant for the safety criteria.

4.0 CONCLUSION

The RU concluded, based on the considerations described above and in Appendix A, that BNFL has adequately demonstrated with reasonable assurance that the health and safety of the public and the workers will not be endangered by the proposed amendment and the proposed amendment will not have a significant effect on the environment. The proposed amendment complies with applicable laws, regulations, and requirements, and conforms to DOE-stipulated top-level safety standards and principles. The RU review of ABAR-W375-99-00013 concludes that the proposed amendment to the authorization basis is acceptable.